

EXHIBIT B

Peter G. Bertling (SBN 131602)
Jemma Parker Saunders (SBN 227962)
Bertling Law Group
21 East Canon Perdido Street, Suite 204B
Santa Barbara, CA 93101
Telephone: 805-879-7558
Facsimile: 805-869-1597
peter@bertlinglawgroup.com
jemma@bertlinglawgroup.com
Attorneys for Defendant
WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**ALAMEDA COUNTY MALE
PRISONERS, et al.**

Plaintiffs,

v.

**ALAMEDA COUNTY SHERIFF'S
OFFICE, et al.,**

Defendants.

Case No.: 3:19-cv-07423-JSC

**DEFENDANT WELLPATH'S
AMENDED NOTICE OF
TAKING DEPOSITION OF
MICHAEL LOCKHART**

Date: **OCTOBER 5, 2023**

Time: **9:00 A.M. PST**

Location:

**Law Offices of
Yolanda Huang
2748 Adeline Street
Suite A
Berkeley, CA 94703**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD HEREIN:

PLEASE TAKE NOTICE that Defendant WELLPATH, will take the deposition of **MICHAEL LOCKHART** on **THURSDAY, OCTOBER 5, 2023, at 9:00 A.M. PST.,** Law Offices of Yolanda Huang, 2748 Adeline Street, Suite A, Berkeley, CA 94703.

PLEASE TAKE FURTHER NOTICE that the deposing party intends to cause the proceedings to be recorded both stenographically, before a certified court reporter, and by videotape. The deposing party specifically reserves the right to use the videotape of the

1 deposition at the time of trial. Said deposition will be taken before a duly qualified
2 certified court reporter, pursuant to the provisions of Federal Rules of Civil Procedure,
3 Rule 30, and will continue until completed, or until the end of seven hours of recorded
4 testimony, pursuant to Federal Rule of Civil Procedure 30(d)(1).

5 Respectfully submitted,

6 DATED: September 25, 2023

BERTLING LAW GROUP

7 /s/ Peter G. Bertling

8 Peter G. Bertling

9 Jemma Parker Saunders

10 Attorneys for Defendant

11 WELLPATH
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Peter G. Bertling [SBN 131602]
Jemma Parker Saunders [SBN 227962]
Bertling Law Group
21 East Canon Perdido Street, Suite 204B
Santa Barbara, CA 93101
Telephone: 805-879-7558
Facsimile: 805-962-0722
peter@bertlinglawgroup.com
jemma@bertlinglawgroup.com
Attorneys for Defendants
WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;
ALAMEDA COUNTY FEMALE
PRISONERS And Former Prisoners, JACLYN
MOHRBACHER, ERIN ELLIS, DOMINIQUE
JACKSON, CHRISTINA ZEPEDA, ALEXIS
WAH, AND KELSEY ERWIN, et al on behalf
of themselves and other similarly situated,

Plaintiffs,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;
WELLPATH MANAGEMENT, INC., a
Delaware Corporation (formerly known as
California Forensic Medical Group) a
corporation; its Employees and Sub-
Contractors, and Rick & Ruth ROEs Nos. 26-
50; **ARAMARK CORRECTIONAL**
SERVICES, LLC, a Delaware Limited
Liability Company; its Employees and Sub-
Contractors, and Rick & Ruth ROES Nos.
51-75,

Defendants.

Case No.: 3:19-cv-07423 JSC

CERTIFICATE OF SERVICE

Action Filed: November 12, 2019
Judge: Hon. Jacqueline Scott Corley
Ct rm: E—15th Floor

3:19-cv-07423-JSC

CERTIFICATE OF SERVICE

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 years and not a party to the within action. My business address is 21 E. Canon Perdido Street, Suite 204B, Santa Barbara, California 93101. My e-mail address is stephanie@bertlinglawgroup.com.

On September 25, 2023, I served a true copy of the following document:

- **DEFENDANT WELLPATH'S *AMENDED* NOTICE OF TAKING DEPOSITION OF MICHAEL LOCKHART**

Counsel for Plaintiffs:

Yolanda Huang
LAW OFFICES OF YOLANDA HUANG
2748 Adeline Street, Suite A
Berkeley, CA 94703
Telephone: 510-329-2140
Facsimile: 510-580-9410
yhuang.law@gmail.com
yhuang.lawoffice@protonmail.com

Thomas E. Nanney
LAW OFFICE OF THOMAS E. NANNEY
2217 W. 120th St.
Leawood, KS 66209
Telephone: 816-401-0047
tomnanney@aol.com

Counsel for Defendants ALAMEDA COUNTY SHERIFF'S OFFICE, (ERRONEOUSLY SUED HEREIN AS "ALAMEDA COUNTY"), DEPUTY JOE, AND DEPUTY IGNONT:

Temitayo O. Peters
Gregory B. Thomas
Jasper L. Hall
BURKE, WILLIAMS & SORENSON, LLP
1999 Harrison Street, Suite 1650
Oakland, CA 94612-3520
Telephone: 510-273-8780
Facsimile: 510-839-9104
tpeters@bwslaw.com
gthomas@bwslaw.com
jhall@bwslaw.com
tlee@bwslaw.com
mprakash@bwslaw.com

///
///
///
///

Counsel for Defendants ARAMARK CORRECTIONAL SERVICES LLC:

Charles J. Reitmeyer
Emily S. Kimmelman Wheeling
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: 215.963.5320
charles.reitmeyer@morganlewis.com
emily.wheeling@morganlewis.com
robert.kirsch@morganlewis.com
mitchell.benson@morganlewis.com
amanda.lashner@morganlewis.com
ronald.hasman@morganlewis.com

Salayha K. Ghoury
LEWIS BRISBOIS BISGAARD & SMITH LLP
333 Bush Street, Suite 1100
San Francisco, CA 94104
Telephone: 415.362.2580
Facsimile: 415.434.0882
salayha.ghoury@lewisbrisbois.com

[X] ELECTRONIC SERVICE

Based on a court order or an agreement of the parties to accept electronic service, I caused the document to be sent to the person(s) at the electronic service address(es) above.

[X] FEDERAL

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **September 25, 2023**, at Santa Barbara, California.



Stephanie S. Aguiniga

Subject: ELECTRONIC SERVICE ONLY | Gonzalez v. ACSO, et al | Wellpath Amended Deposition Notices of Michael Lockhart

Date: Monday, September 25, 2023 at 4:12:23 PM Pacific Daylight Time

From: Stephanie Aguiniga <stephanie@bertlinglawgroup.com>

To: Yolanda Huang <yhuang.law@gmail.com>, Law Office of Yolanda Huang <yhuang.lawoffice@protonmail.com>, THOMAS NANNEY <tomnanney@aol.com>, Thomas, Gregory B. <GThomas@bwsllaw.com>, Peters, Temitayo O. <TPeters@bwsllaw.com>, Hall, Jasper L. <JHall@bwsllaw.com>, Lee, Tawnya <TLee@bwsllaw.com>, Prakash, Mrinalini V. <MPrakash@bwsllaw.com>, Reitmeyer, Charles J. <charles.reitmeyer@morganlewis.com>, Wheeling, Emily Kimmelman <emily.wheeling@morganlewis.com>, Kirsch, Rob <robert.kirsch@morganlewis.com>, Benson, Mitch <mitchell.benson@morganlewis.com>, amanda.lashner@morganlewis.com <amanda.lashner@morganlewis.com>, Hasman, Ronald D. <ronald.hasman@morganlewis.com>, salayha.ghoury@lewisbrisbois.com <salayha.ghoury@lewisbrisbois.com>

CC: Jemma Parker Saunders <jemma@bertlinglawgroup.com>, Peter Bertling <peter@bertlinglawgroup.com>, Cyndi Sierra <cyndi@bertlinglawgroup.com>

Priority: High

Attachments: image001.jpg, d-Am Depo Ntc M. Lockhart 10-5-23 [Gonzalez].pdf
Counsel:

Attached please find Wellpath's amended deposition notice of Michael Lockhart on 10/5/23, 9:00 a.m. PST at Law Offices of Yolanda Huang, 2748 Adeline Street Suite A, Berkeley, CA 94703.

Best,
Stephanie



Stephanie S. Aguiniga | Assistant
21 East Canon Perdido Street, Suite 204B
Santa Barbara, CA 93101
Main: 805-879-7558
Direct: 805-456-2736
Facsimile: 805-869-1597
stephanie@bertlinglawgroup.com
www.bertlinglawgroup.com

PRIVILEGED AND CONFIDENTIAL
This message and any attached files are intended only for the use of the addressee and may contain information that is PRIVILEGED and CONFIDENTIAL, and/or may contain ATTORNEY WORK PRODUCT or otherwise exempt from disclosure. If you are not the intended recipient, you are hereby notified that the viewing, copying or any dissemination of this information is prohibited. If you have received this communication in error, please erase all copies of the message and its attachments and notify us immediately. Thank you.